

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES & EXCHANGE COMMISSION,

Plaintiff,

v.

GIBRALTAR GLOBAL SECURITIES, INC.,
and WARREN A. DAVIS,

Defendants.

13 CV 2575 (GBD) (JCF)

**DECLARATION OF
PHILIP C. PATTERSON, ESQ.**

Pursuant to 28 U.S.C. § 1746, **PHILIP C. PATTERSON** declares:

1. I am counsel to the law firm of De Feis O'Connell & Rose, P.C., attorneys for Gibraltar Global Securities, Inc. ("GGSI") and Warren A. Davis, the defendants in the above-captioned action. I am fully familiar with the facts contained herein. I submit this declaration in support of the defendants' motion for a protective order pursuant to Rule 26. I certify that counsel for the defendants has in good faith conferred with plaintiff in an effort to resolve this issue without court intervention.

2. Annexed hereto as Exhibit A is a true and correct copy of a Declaration by defendant Gibraltar Global Securities Inc.'s Bahamian counsel, Raynard S. Rigby.

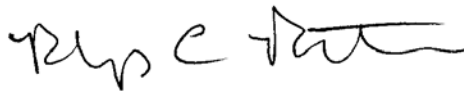
3. Annexed hereto as Exhibit B is a true and correct copy of a letter by defendant Warren Davis' Bahamian counsel, Sean Moree.

4. Annexed hereto as Exhibit C is a letter from plaintiff Securities Exchange Commission dated October 17, 2014.

5. Annexed hereto as Exhibit D is a letter from plaintiff Securities and Exchange Commission dated August 6, 2013.

6. WHEREFORE, for the reasons set forth in the accompanying Memorandum of Law, I respectfully request that the Court enter a protective order concerning all GGSI documents located in the Bahamas.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 5, 2014.



Philip C. Patterson (PP-9995)

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